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*Attorneys for Defendant
The TJX Companies, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

CARLOS HERRERA, on behalf of
himself and all others similarly
situated,

Plaintiff,

v.

THE TJX COMPANIES INC.,
Defendant.

Civil Action No.: 2:23-cv-04185-MEF-
LDW

**DEFENDANT'S NOTICE OF
MOTION TO DISMISS THE
COMPLAINT**

ORAL ARGUMENT REQUESTED

**MOTION RETURN DATE:
SEPTEMBER 18, 2023**

PLEASE TAKE NOTICE that Defendant The TJX Companies, Inc., incorrectly named The TJX Companies Inc. in the Complaint, ("Defendant"), upon the Memorandum of Law in Support of Defendant's Motion to Dismiss the Complaint, and by and through its undersigned counsel, Seyfarth Shaw LLP, will move this Court on September 18, 2023, before the Honorable Michael E. Farbiarz, United States District Court Judge, at the Martin Luther King Building, 50

Walnut Street, Newark, New Jersey 07102, for an Order granting Defendant's Motion to Dismiss the Complaint.

Dated: New York, New York
August 24, 2023

SEYFARTH SHAW LLP

/s/ Joseph Vento

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CERTIFICATE OF SERVICE

I, Joseph Vento, hereby certify that on August 24, 2023, I electronically filed the foregoing Notice of Motion, Memorandum of Law in Support, and Proposed Order, via the Court's CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Joseph Vento
Joseph Vento